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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PATRICE BOURDEAU,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00927-JAD-NJK

**STIPULATION AND PROPOSED ORDER
FOR EXTENSION OF TIME FOR
DEFENDANT TO FILE OPPOSITION TO
PLAINTIFF'S MOTION FOR REMAND**

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of 60 days to file her opposition to Plaintiff's motion for remand, from December 3, 2018, to February 1, 2019.

This is the second continuance in this case and the first continuance sought by Defendant. Defendant acknowledges the Court's previous order stating that no further extensions would be granted. However, there is good cause for this request. Defendant is seeking this extension due to Defendant's counsel's crowded briefing schedule with multiple deadlines on or around December 3, 2018, including other cases that had been previously extended and new matters that were not previously anticipated and

1 could not be shifted or reassigned. Moreover, for about two and half weeks in early to mid-November,
2 Defendant's counsel experienced sickness from a cold/virus that incapacitated her and inhibited her
3 ability to work for multiple days and has also created further crowding of Defendant's counsel briefing
4 schedule. As a result, Defendant's counsel continues to address her existing workload, including
5 shifting or seeking reassignment for her matters, including this case, as needed, given the circumstances,
6 and as Defendant's counsel continues to address her continuing workload for the next several weeks
7 with variable degrees of ability to be adjusted.

8 Because of the factors described above, Defendant is requesting additional time up to and
9 including February 1, 2019, to fully review the administrative record and research the issues presented
10 by Plaintiff's motion for remand. This request is made in good faith with no intention to unduly delay
11 the proceedings.

12 Therefore, with this Court's approval, the Court's scheduling order shall be extended by 60 days,
13 so that Defendant may file her opposition to Plaintiff's motion for remand on or before February 1,
14 2019.

15 Respectfully submitted,

16
17 Dated: November 30, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

18 /s/ Cyrus Safa

(as authorized via e-mail on 11/27/2018)

19 CYRUS SAFA

20 Attorneys for Plaintiff

21 Dated: November 30, 2018

STEVEN W. MYHRE

Acting United States Attorney

23 /s/ Carolyn B. Chen

CAROLYN B. CHEN

24 Special Assistant United States Attorney

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PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

HON. NANCY J. KOPPE
UNITED STATE MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I, Carolyn B. Chen, certify that the following individuals were served with a copy of the
**STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME FOR DEFENDANT
TO FILE OPPOSITION TO PLAINTIFF'S MOTION FOR REMAND** on the date and via the
method of service identified below:

CM/ECF:

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Dated this 30th day of November 2018.

/s/ Carolyn B. Chen
CAROLYN B. CHEN
Special Assistant United States Attorney